

December 15 2003

Carlyn Winter Prisk (3HS11)
U S Environmental Protection Agency Region 3
1650 Arch Street
Philadelphia PA 19103-2029

**RE Follow-up 104 E Request - Charles H Goebel & Sons, Inc
Lower Darby Creek Area Superfund Site
Delaware and Philadelphia Counties, PA**

Dear Ms Prisk

On behalf of Charles H Goebel & Sons Inc I am responding to Joan Armstrong's request for additional information dated November 25 2003 which we received December 5 2003 Enclosed is Charles H Goebel & Sons Inc's answers to the request for additional information

Charles H Goebel & Sons would incorporate by reference its remarks in the cover letter of February 22 2002 and its response to the February 1 2002 request for information

Charles H Goebel & Sons Inc trusts that the enclosed information satisfies the follow-up request but if there are any additional questions please contact me

Very truly yours



JOHN K GOEBEL
President

JKG/dkh

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11/16/03
(Red)

CHARLES H GOEBEL & SONS, INC RESPONSE
TO EPA'S NOVEMBER 25, 2003 REQUEST
FOR ADDITIONAL INFORMATION REQUESTED IN ENCLOSURE F

1 With respect to Goebel's response to Question 2 of EPA's February 1 2002 Information Request in which Goebel stated that its business was cabinet making please describe in detail the materials used to manufacture cabinets between 1958 and 1976 In particular please identify all materials used to paint or stain the cabinets and all materials used to clean or lubricate the equipment used to manufacture the cabinets

We have no exact recollection of materials used 27 to 45 years ago and there are no records available Typical materials would have included solid and veneer lumbers, water-based adhesives and metal fasteners Paints and stains would most likely have included lacquer-based sealer, varnish and stain No oil-based finishes were used during that time period The equipment used in the manufacturing process may have included table saws, crosscut saws, shapers, planers, pneumatic staplers, hand tools and spray paint equipment All of the power equipment probably was equipped with ball bearings which require no lubrication The pneumatic equipment may have required minimum oil dispensed from a small can directly into the tool which vaporizes over time There was no clean-up or disposal involved in that process Occasional cleaning of the spray equipment may have required some thinner hand applied with a rag

2 With respect to Goebel's response to Question 3 in which it identified three individuals with knowledge of Goebel's operations please indicate whether this list represents all such current or former employees If it does not please identify ALL individuals who were employed by Goebel who may have knowledge of the cabinet making operations and waste disposal practices between 1958 and 1976

The three individuals identified in Goebel's response to question 3 are the only three who had knowledge of Goebel's operations, including its waste disposal practices between 1958 and 1976 Due to the loss of records, Goebel has no knowledge of any other employees during that period who may have had knowledge, except Kevin Brown who has been working in the hardware department since January 6, 1975 He still is employed by Goebel at 100 Sycamore Avenue, Folsom, PA 19033, (610) 532-4644 He would have no knowledge of the waste disposal practices of Goebel

3 Please explain on what information Goebel relied to state its belief that Tri-County Hauling was used as a transporter during the period 1974 to 1976 Do you have any reason to believe that other haulers may have been used between 1958 and 1976?

It is the personal recollection of John K Goebel that Tri-County Hauling transported waste during the period 1974 to 1976 John K Goebel does not believe that any other haulers were used between 1958 and 1976

4 Was any of Goebel's waste stored on site? If so where and in what type of containers was waste stored on site?

No waste was accumulated or stored on site

5 In Goebel's response to Question 6 it indicated that paint and stain were used in the cabinet making process Please identify the specific brands or types of paint or stain used

Due to the loss of records, Goebel has no knowledge of the specific brands or types of stains used Recollection is that Finnaren & Haley and National Chemical supplied the paint or stains used

6 With respect to Goebel's response to Question 6(f) in which Goebel identified Finnaron & Haley and National Chemical as companies that supplied hazardous substances to Goebel please identify an address for each of these companies

Finnaren & Haley has a local distributor at MacDade Boulevard and Ridley Avenue in Folsom, PA Goebel believes that National Chemical is no longer in business and has no address to provide due to the loss of records of the business as explained in its initial response to EPA's February 1, 2002 request

7 In Goebel's response to Question 7 it indicated that approximately 6 to 8 dumpsters of varying sizes were used per year Describe the size (e g 2 cubic yards 4 cubic yards 20 cubic yards) of each of these dumpsters

It is the recollection of John K Goebel that they were typically 10 or 20 yard dumpsters

8 Who provided the dumpsters for Goebel's use?

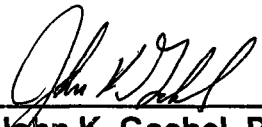
It is the recollection of John K Goebel that only Tri-County Hauling provided these dumpsters

9 In Goebel's response to Question 7 it states that the dried and hardened residue of paint or stain in their cans was discarded as waste Were the paint and stain cans

John K. Goebel
(Red)

Charles H Goebel, Jr , president and owner of Charles H Goebel & Sons, Inc , now deceased, would have been responsible for the production of those documents produced by Goebel All other documents would have been produced by third parties He would have been the person who would have been responsible for the retention of the documents and also the person responsible for the destruction of those documents, but for the fact that the documents were destroyed by the fire described above

Charles H Goebel & Sons, Inc

By 
John K Goebel, President